

**Ralph C. Spooner, OSB No. 732880**

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Of Attorney for Defendant State Farm  
Mutual Automobile Insurance Company

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

TRAVIS BATTEN,

Case No. 3:19-cv-01200-MC

Plaintiff,

***Consolidated with:***

Case No. 1:18-cv-00676-MC

vs.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY,

**DECLARATION OF RALPH C.  
SPOONER IN SUPPORT OF STATE  
FARM'S REPLY IN SUPPORT OF  
STATE FARM'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

Defendant.

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I, Ralph C. Spooner, do hereby state as follows:

1. I make this Declaration based on personal knowledge, and I am competent to testify to the matters herein.

2. I am one of the attorneys for defendant State Farm Mutual Automobile Insurance Company (“State Farm”) in the above-captioned case.

3. I make this Declaration in support of State Farm’s Reply in support of State Farm’s Motion for Partial Summary Judgment.

4. Attached as Exhibit 1 to this Declaration is a true and correct copy of Hon. Audrey J. Broyles' letter opinion dated November 21, 2019, granting State Farm's Motion for Summary Judgment in *Crystal Chadwell v. State Farm Mut. Auto. Ins. Co.*, Marion County Circuit Court Case No. 19CV01140.

5. Attached as Exhibit 2 to this Declaration is a true and correct copy of the General Judgment for Declaratory Relief and Money Award signed by Hon. Audrey J. Broyles on December 13, 2019, in *Crystal Chadwell v. State Farm Mut. Auto. Ins. Co.*, Marion County Circuit Court Case No. 19CV01140, with plaintiff Crystal Chadwell's personal information redacted.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 21<sup>st</sup> day of February, 2020.

s/ Ralph C. Spooner  
RALPH C. SPOONER, OSB# 732880  
Of Attorney for Defendant State Farm Mutual  
Automobile Insurance Company  
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## **CERTIFICATE OF SERVICE**

I hereby certify that I served a copy of the foregoing **DECLARATION OF RALPH C. SPOONER IN SUPPORT OF STATE FARM'S REPLY IN SUPPORT OF STATE FARM'S MOTION FOR PARTIAL SUMMARY JUDGMENT** to the following:

Michael Brian, OSB No. 710309  
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Attorneys for *Defendant Illinois National Insurance Company*

- by emailing a copy to said attorney at the above email address with consent of counsel;
- by mailing a copy in a sealed, first-class, postage prepaid envelope, addressed to said attorneys at the above address and deposited in the U.S. Mail;
- by serving correct copies thereof, certified by me as such, to attorneys via the United States District Court for the District of Oregon's CM/ECF filing system.

DATED this 21<sup>st</sup> day of February, 2020.

s/ Ralph C. Spooner  
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